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FCC-MAILROOM

# SNOPAC 9-1-1 COMMUNICATIONS

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SNOPAC DIRECTOR:

Thomas E. Howell

ASSISTANT DIRECTOR:

Jim Couture

September 6, 2005

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

RE: WT Docket 05-196

Dear Marlene Dortch:

SNOPAC is a primary Public Safety Answering Point (PSAP) in Snohomish County, Washington. The SNOPAC 911 center answers more than 600,000 calls per year and dispatches 37 police, fire and paramedic services to its citizens.

We support the FCC's ruling to require interconnected VoIP providers to ensure they are able to deliver accurate location and call back information to the PSAP when their customers call 9-1-1 for emergency assistance.

In a crisis many people tend to lose focus and cannot recall simple details such as their address or they are unable to provide an adequate location. We spent years building an enhanced 9-1-1 system that helps dispatchers do their job. The VoIP 9-1-1 services may erase all that effort unless they are required to provide the same protections for our citizens. The VoIP providers fail to understand that the vast majority of citizens have an expectation that a functioning telephone will reach 9-1-1 in an emergency.

We ask the Commission to not extend the 120-day deadline for interconnected VoIP providers to provide enhanced 9-1-1 services to their customers. The providers have been aware of this problem and failed to act prior to saturating the market with these devices. Please ensure that any requirements imposed on VoIP providers does not cause undue burden on a PSAP's ability to process and dispatch emergency calls. Finally, please ensure that the Commission's rules do not impose rules that creates a financial burden for considerable upgrades or replacement of PSAP equipment.

Sincerely,

Thomas E. Howell, Director

cc: APCO International Office of Legislative Affairs

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